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**NOTES OF CASES.**

**SALE OF STOCK IN BULK—CREDITOR'S RIGHTS—SEC. 2460A, VA. CODE 1904.**—A creditor of one who sells his stock of goods in bulk without complying with the provisions of the statute regulating such sales is held, in *Rothchild Bros. v. Trewella* (Wash.), 68 L. R. A. 281, to have no right to maintain a direct action against the vendee to recover the amount of his claim, where the statute merely declares the sale void, without making any provision for an action against the vendee.

A statute avoiding a sale in bulk of a stock of goods unless certain steps are taken, in favor of persons who have sold goods or loaned money for continuance of the business, and rendering the vendee liable to pay their claims, is held, in *McKinster v. Sager* (Ind.), 68 L. R. A. 273, to be void as denying the other creditors equal protection of the laws.

See sec. 2460a, Va. Code, 1904; 10 Va. Law Reg. 270; 11 Va. Law Reg. (June number), 143.

**CONDITIONAL SALES—VENDEE'S REFUSAL TO ACCEPT.**—The vendor of a machine the title to which is not to pass until the price is paid is held, in *National Cash Register Co. v. Hill* (N. C.), 68 L. R. A. 100, to be entitled, in case of the refusal of the purchaser to accept it, to sue for the purchase price, and not to be bound to take steps to protect himself or preserve the value of the property, and sue merely for the difference between the contract price and the value of the machine. A note to this case reviews the other authorities on remedy of conditional vendor for refusal to accept.

**NEW TRIAL—JUDGMENT SATISFIED.**—The power of a trial court to grant, within the period allowed by statute, a new trial for newly discovered evidence is held, in *Chambliss v. Hass* (Iowa), 68 L. R. A. 126, not to be cut off by the fact that the judgment has been affirmed on appeal and execution returned satisfied. The question of the right to a new trial after the satisfaction of the judgment is the subject of a note to this case.

**CRIMINAL LAW—SEDUCTION—CONDITIONAL PROMISE OF MARRIAGE—CF. SEC. 3677, VA. CODE 1904.**—A prosecution for seduction is held, in *State v. O'Hare* (Wash.), 68 L. R. A. 107, not to be defeated by the fact that the woman yielded under a conditional promise of immediate marriage in case she got into trouble, under a statute providing punishment in case any person seduces and debauches an unmarried woman of previously chaste character. The Virginia statute (sec. 3677, Va. Code 1904), is similar to the Washington statute.

**CRIMINAL LAW—CORPUS DELICTI—EXTRAJUDICIAL CONFESSION.**—The mere extrajudicial confession of an accused is held, in *Bines v. State* (Ga.)